NPDES Permit Tracking No.:
MAR05D005

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: Prolerized New England Company

2. NPDES Permit Tracking No.: MAR05D005

3. Facility Physical Address:

a. Street: 69 Rover Street

b. City: Everett c. State: MA d. Zip Code: 02149 -

4. Lead Inspectors Name: Richard Carmosino Title: Env. Engineer

Additional Inspectors Name(s): Keri Fitzpatrick Regional Env. Manager

5. Contact Person: Keri Fitzpatrick Title: Regional Env. Manager

Phone: 781 - 873 - 1663 Ext. E-mail: kfitzpatrick@schn.com

6. Inspection Date: 09 / 16 / 2010

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☑ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☑ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
MAR05D005

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☑ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☑ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional Inspection activities resulting from this review:

Laboratory analytical data indicate that stormwater pollutants periodically exceed the benchmark values for metals. The exceedances generally occur when suspended solids are elevated. Due to the nature of the facility as a scrap metal recycling facility, scrap metal is stored outdoors in stockpiles and comes in contact with stormwater. However, the data does not demonstrate a pattern of continuous exceedances and pollution hot spots are not evident.

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

There is no evidence of pollutants entering the drainage system or discharging to surface waters. Outfall #1 is active and discharges to the Mystic River. With the exception of the February 26, 2010 sampling event which noted a slightly cloudy discharge, no other incidents of pollutants were noted during sampling events or regular facility inspections. The condition of Outfall #1 is excellent and no scouring is present below the outfall. Outfall #2 is not active and it's activation is pending the installation of an additional stormwater system at the site. There is debris and sedimentation present at Outfall #2 as a result of material being washing ashore from the Mystic River during the changes in tide.

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?
☑ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? 1

***NOTE:** Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

NPDES Permit Tracking No.:
MAR05D005

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA 1:

1. Brief Description:

Misc. light iron/non-ferrous stored in open stockpiles

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO
3. Have any control measures failed and require replacement? ☐ YES ☑ NO
4. Are any additional/revised control measures necessary in this area? ☑ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

Laboratory analytical data indicate that stormwater pollutants periodically exceed the benchmark values for metals. The exceedances generally occur when suspended solids are elevated. Due to the nature of the facility as a scrap metal recycling facility, scrap metal is stored outdoors in stockpiles and comes in contact with stormwater.

INDUSTRIAL ACTIVITY AREA 2:

1. Brief Description:

Automobile bodies

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO
3. Have any control measures failed and require replacement? ☐ YES ☑ NO
4. Are any additional/revised c necessary in this area? ☐ YES ☑ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA 3:

Brief Description:

Heavy scrap stockpile

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO
3. Have any control measures failed and require replacement? ☐ YES ☑ NO
4. Are any additional/revised BMPs necessary in this area? ☑ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

Laboratory analytical data indicate that stormwater pollutants periodically exceed the benchmark values for metals. The exceedances generally occur when suspended solids are elevated. Due to the nature of the facility as a scrap metal recycling facility, scrap metal is stored outdoors in stockpiles and comes in contact with stormwater.

NPDES Permit Tracking No.:
MAR05D005

NOTE: Copy this page and attach additional pages as necessary

INDUSTRIAL ACTIVITY AREA 4:

1. Brief Description:

Prepared scrap stockpile

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised BMPs necessary in this area? ☑ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

Laboratory analytical data indicate that stormwater pollutants periodically exceed the benchmark values for metals. The exceedances generally occur when suspended solids are elevated. Due to the nature of the facility as a scrap metal recycling facility, scrap metal is stored outdoors in stockpiles and comes in contact with stormwater.

INDUSTRIAL ACTIVITY AREA 5:

1. Brief Description:

Unprepared scrap stockpile

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised BMPs necessary in this area? ☑ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

Laboratory analytical data indicate that stormwater pollutants periodically exceed the benchmark values for metals. The exceedances generally occur when suspended solids are elevated. Due to the nature of the facility as a scrap metal recycling facility, scrap metal is stored outdoors in stockpiles and comes in contact with stormwater.

INDUSTRIAL ACTIVITY AREA 6:

1. Brief Description:

Non-ferrous scrap stockpile

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☑ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
MAR05D005

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 1 of 1 for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
- ☑ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☑ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

Laboratory analytical data indicate that stormwater pollutants periodically exceed the benchmark values. The exceedances generally occur when suspended solids are elevated. Due to the nature of the facility as a scrap metal recycling facility, scrap metal is stored outdoors in stockpiles and comes in contact with stormwater.

5. Date problem identified: 09 / 23 / 2010

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☑ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

The frequency of sweeping will be increased, and the stormwater system (catch basins, lines, retention basins, oil/water separators) will be cleaned out more frequently.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☑ NO

9. Date corrective action initiated: 09 / 23 / 2010

10. Date correction action completed: ___ / ___ / ____ or expected to be completed: 03 / 31 / 2011

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

The frequency of sweeping will be increased, and the stormwater system lines, catch basins, and retention basins will be cleaned out more frequently. This corrective measure will be continued until the benchmark concentrations are met or until appropriate to reduce the frequency.

NPDES Permit Tracking No.:
MAR05D005

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☐ YES ☑ NO

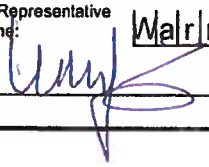
If NO, summarize why you are not in compliance with the permit:

Laboratory analytical data indicate that stormwater pollutants periodically exceed the benchmark values. The exceedances generally occur when suspended solids are elevated. Due to the nature of the facility as a scrap metal recycling facility, scrap metal is stored outdoors in stockpiles and comes in contact with stormwater. The frequency of sweeping will be increased, and the stormwater system lines, catch basins, and retention basins will be cleaned out more frequently. This corrective measure will be continued until the frequency of sweeping and cleaning is identified to ensure that pollutant concentrations are below the benchmark concentrations.

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: Warren Jennings Title: Regional Director

Signature:  Date Signed: 11/17/10